



February 23, 2023

Via ECF and E-mail

The Honorable Katherine Polk Failla
U.S. District Court Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

Re: *In re Tether and Bitfinex Crypto Asset Litigation*, 19-CV-09236 (KPF)

Dear Judge Failla:

Pursuant to the Amended Civil Case Management Plan and Scheduling Order, ECF No. 298 at ¶ 6(c), Plaintiffs ask the Court for permission to serve an interrogatory asking Poloniex to identify all accounts on its exchange owned or controlled by the B/T Defendants. Ex. A.

Plaintiffs first proposed this interrogatory to Poloniex in early December 2022. Following negotiations, Poloniex agreed not to oppose Plaintiffs' motion to serve and also agreed that it would be less burdensome to provide this information to Plaintiffs by interrogatory rather than a deposition. *See* Local Civil Rule 33.3(b)(1) (noting that a party may serve interrogatories "if they are a more practical method of obtaining the information sought than a request for production or a deposition[.]"). Courts in this District approve interrogatories if they would be more economical and less burdensome on the responding party than the alternatives. *See, e.g., PKF Int'l Corp. v. IBJ Schroder Leasing Corp.*, 1996 WL 525862, at *8 (S.D.N.Y. Sept. 17, 1996); *NRDC v. Fox*, 1996 WL 497024, at *3 (S.D.N.Y. Aug. 30, 1996).

Respectfully submitted,

/s/ Caitlin Halligan

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